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October 4, 2024

**VIA ECF**

Honorable Georgette Castner  
United States District Judge  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, N.J. 08608

**Re: *Edwin H. Stier, Esq., as Wind Down Trustee for MLS Berkowitz Investments, LLC v. Diego Possebon, et al.*, Case No. 3:24-cv-04647-GC-RLS**  
**Request for Extension of Time to Respond to Pre-Motion Letter (ECF No. 239)**

Dear Judge Castner:

This law firm is co-counsel to the Plaintiff in the above-referenced case. On September 30, 2024, Defendant Opus Entretenimento (“Opus”) filed a letter requesting a pre-motion conference concerning Opus’s anticipated motion to dismiss. *See* (ECF No. 239). Under Your Honor’s Judicial Preferences concerning Motions, Plaintiff’s response to Opus’s letter would be due on October 7, 2024. We write respectfully to request an extension of time until October 9, 2024, to respond to Opus’s letter. Opus’s counsel has graciously consented to Plaintiff’s extension request.

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'E-Kanefsky', with a stylized flourish at the end.

Eric T. Kanefsky, Esq., Senior Partner  
Calcagni & Kanefsky LLP

cc (via ECF): all counsel of record